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August 8, 2024

The Honorable Hector Gonzalez
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *North American Soccer League, LLC v. United States Soccer Federation, Inc. and Major League Soccer, L.L.C., No. 1:17-cv-05495* – Pretrial Schedule

Dear Judge Gonzalez:

Pursuant to the Court’s Order of June 27, 2024, ordering certain deadlines into effect, the parties hereby jointly propose the following pretrial deadlines:

Date	Event
8/29/24	Parties exchange initial witness lists, affirmative deposition designations and exhibit lists (excluding demonstratives). NASL highlights its deposition designations in light blue, and Defendants in yellow.
8/29/24	NASL sends Defendants draft Joint Pretrial Order based on Judge Gonzalez’s template, with placeholders for information to be provided by Defendants.
10/9/24	Parties exchange deposition counter-designations, objections to deposition designations, and objections to witness lists. Overlapping deposition designations are highlighted in green. NASL highlights counter-designations in red. Defendants highlight counter-designations in orange.
10/9/24	Parties exchange objections to exhibit lists, and exchange any rebuttal exhibit lists.
10/9/24	Defendants send NASL revised draft Joint Pretrial Order with placeholders filled and any requested edits to joint sections.
10/25/24	Parties exchange responses to objections to exhibit lists, and objections to rebuttal exhibit lists.
10/25/24	Parties exchange objections to deposition counter-designations and responses to objections to affirmative deposition designations.
10/25/24	Deadline for Parties to notify one another of planned motions <i>in limine</i> .
11/1/24	Parties exchange responses to objections to rebuttal exhibits.

Date	Event
11/1/24	Parties exchange responses to objections to deposition counter-designations.
10/9/24 to 11/4/24	The parties confer and exchange revised drafts of the Joint Pretrial Order to the extent necessary and attempt to resolve objections and other disagreements. The parties combine this into one document, including exhibit lists (excluding demonstratives), current witness lists (including any updates since prior exchanges), deposition designations, and any remaining objections and responses thereto.
11/4/24	Motions <i>in limine</i> opening briefs. (ECF No. 403)
11/4/24	Last day for meet and confer sessions on exhibit lists, deposition designations.
11/4/24	Proposed joint pretrial order (including deposition designations). (ECF No. 403)
11/18/24	Oppositions to motions <i>in limine</i>. (ECF No. 403)
11/18/24	Parties exchange proposed jury instructions, verdict sheet, and <i>voir dire</i> . NASL sends Defendants statement of case for use in <i>voir dire</i> .
11/18/24 to 11/25/24	Parties attempt to negotiate joint proposed jury instructions, verdict sheet, <i>voir dire</i> , and statement of the case for use in <i>voir dire</i> . Parties combine their jury instructions into one document, with joint instructions where possible and otherwise each side's proposed instructions.
11/25/24	Proposed final jury instructions. (ECF No. 403)
11/25/24	Proposed verdict sheet. (ECF No. 403)
11/25/24	Short description of the case for use in <i>voir dire</i>. (ECF No. 403)
11/25/24	Proposed <i>voir dire</i> questions. (ECF No. 403)
11/25/24	Updated list of the witnesses each party plans to call and the names of people, entities, and places that the parties anticipate that they and their witnesses will discuss during trial. (ECF No. 403)
12/20/24 2 p.m.	Final pretrial conference. (ECF No. 403)
1/6/25	Trial. (ECF No. 403)

In addition, the parties have conferred regarding the submission of an early tranche of more significant *in limine* motions, as discussed with the Court at the June 21 status conference, and have agreed on the following, subject to the Court's approval:

1. Two early motions per side. The parties will exchange brief descriptions of the anticipated motions on August 16, followed by two weeks in which to meet and confer.
2. Opening briefs would be filed August 30. Opposition briefs due September 13. Reply briefs September 23.
3. Opening briefs and oppositions on each of the two motions would be limited to 15 pages. Ten pages for replies.
4. Remaining motions would be subject to the deadlines noted in the table above for a motions list exchange and meet and confer period, to the November 4 filing date, and to the Court's usual rules. Both sides preserve their right to seek relief from those Individual Practices.

Respectfully submitted,

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